UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TAHNEE MARIE POPPY, Plaintiff, v. M & T BANK CORPORATION, SPECIALIZED LOAN SERVICES, AND EQUIFAX INFORMATION SERVICES LLC, Defendants.	)	Case No. 15-cv-09156 Hon. Charles R. Norgle, Sr Judge Presiding

SPECIALIZED'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendant Specialized Loan Servicing LLC ("Specialized"), erroneously sued as Specialized Loan Services, by its attorneys, moves to dismiss the complaint ("Complaint") filed by Tahnee Marie Poppy ("Plaintiff") pursuant to Federal Rule of Civil Procedure 12(b)(6), and state as follows:

1. Plaintiff's Complaint fails to state a valid cause of action, and thus should be dismissed pursuant to Rule 12(b)(6). *See* Fed. R. Civ. P. 12(b)(6).

2. Specialized contemporaneously file their Memorandum in Support of this Motion.

3. For all these reasons, including those discussed in more detail in Specialized's Memorandum in Support of this Motion, Plaintiff's Complaint should be dismissed with prejudice, and without leave to amend.

WHEREFORE, Specialized requests that this Court dismiss the Complaint with prejudice and without leave to amend, award attorneys' fees and costs pursuant to 15 U.S.C. §§ 1681n(c) and 1681o(b) and 28 U.S.C. § 1927, and provide such further and additional relief as it deems just and appropriate.

Date: February 9, 2016

Respectfully submitted,

SPECIALIZED LOAN SERVICING LLC,

By: /s/ Gregg M. Barbakoff
One of Its Attorneys

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Certificate of Service

Gregg M. Barbakoff, an attorney, certifies that on **February 9, 2016**, he caused the service of a true and correct copy of this Motion and any referenced exhibits via ECF on all parties who are Filing Users.

/s/ Gregg M. Barbakoff